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BEFORE THE POSTAL REGULATORY COMMISSION WASHINGTON, D.C. 20268-0001

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Periodic Reporting (Proposal Two)	Docket No. RM2021-4

MOTION OF PITNEY BOWES INC. FOR LEAVE TO FILE SURREPLY (May 28, 2021)

Pitney Bowes Inc. (Pitney Bowes) respectfully submits this motion for leave to file surreply comments in response to the reply comments filed by the United States Postal Service on May 25, 2021.

Although the Commission's rules do not authorize a response to a reply as a matter of right, the Commission may accept such a pleading as a matter of discretion in appropriate cases.¹ Good cause exists for allowing a response here. Acceptance of these surreply comments will enhance the Commission's ability to evaluate are arguments raised by the Postal Service's reply comments and help clarify the record.

No party will be prejudiced by granting this motion.

Respectfully submitted:

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May 28, 2021

¹ See, e.g., Dkt. No. A2013-5, Order No. 1866 (Oct. 31, 2013) at 3, n.7 (allowing USPS surreply); Dkt. No. C2009-1, Presiding Officer's Ruling No. (June 10, 2010) at 5, n.7, and 9, n.13 (allowing GameFly and USPS surreply comments).